

# FELONY

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

### INDICTMENT FOR UNLAWFUL TRANSFER OF DOCUMENTS AND POSSESSION OF A DOCUMENT-MAKING IMPLEMENT

UNITED STATES OF AMERICA

\* CRIMINAL DOCKET NO.

v.

\* SECTION:

KEVIN ALEXANDER SANTAMARIA-OVIEDO

\* VIOLATIONS: 18 U.S.C. § 1028(a)(2)

a/k/a Pepe

18 U.S.C. § 1028(a)(5)

a/k/a Franklin Telule

\* 18 U.S.C. § 2

a/k/a Franklin Bladimir Telule

\*

JENNIFER MARILYN HERRERA

\* \* \*

The Grand Jury charges that:

#### COUNT 1

On or about April 4, 2012, in the Eastern District of Louisiana, the defendant, **KEVIN ALEXANDER SANTAMARIA-OVIEDO, a/k/a Pepe, a/k/a Franklin Telule, a/k/a Franklin Bladimir Telule**, did knowingly transfer a false identification document, to wit, a Social Security card bearing Social Security Number XXX-XX-6765, that appeared to have been issued by or under the authority of the United States, knowing that such document was produced without lawful authority; all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(i), and (c)(1).

## **COUNT 2**

On or about April 4, 2012, in the Eastern District of Louisiana, the defendant, **KEVIN ALEXANDER SANTAMARIA-OVIEDO, a/k/a Pepe, a/k/a Franklin Telule, a/k/a Franklin Bladimir Telule**, did knowingly transfer a false identification document, to wit, a Permanent Resident Card bearing Alien Registration Number XXX-XXX-870, that appeared to have been issued by or under the authority of the United States, knowing that such document was produced without lawful authority; all in violation of Title 18, United States Code, Section 1028(a)(2), (b)(1)(A)(i), and (c)(1).

## **COUNT 3**

On or about June 5, 2012, in the Eastern District of Louisiana, the defendants, **KEVIN ALEXANDER SANTAMARIA-OVIEDO, a/k/a Pepe, a/k/a Franklin Telule, a/k/a Franklin Bladimir Telule** and **JENNIFER MARILYN HERRERA**, did knowingly produce and possess a document-making implement and authentication feature, to wit: Evolis Pebble Basic card printer, with the intent such document-making implement and authentication feature would be used in the production of a false identification document and another authentication feature which would be so used, and the authentication feature appeared to be issued by or under the authority of the United States and the document-making implement was designed and suited for making an authentication feature and false identification document that appeared to be issued by or under the authority of the United States; all in violation of Title 18, United States Code, Section 1028(a)(5), (b)(1)(A)(i), and (c)(1)(A) and Title 18, United States Code, Section 2.

### **NOTICE OF IDENTIFICATION FRAUD FORFEITURE**

1. The allegations of Counts 1, 2, and 3 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1028 and 982(a)(2)(B).

2. As a result of the offense, alleged in Counts 1 through 3, the defendants, **KEVIN ALEXANDER SANTAMARIA-OVIEDO, a/k/a Pepe, a/k/a Franklin Telule, a/k/a Franklin Bladimir Telule** and **JENNIFER MARILYN HERRERA**, shall forfeit to the United States all personal property used or intended to be used to commit the offense, as a result of identity fraud, in violation of Title 18, United States Code, Sections 1028(b)(5), including but not limited to, in that such property constitutes, or was derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations of Title 18, United States Code, Section 1028; all in violation of Title 18, United States Code, Section 982.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

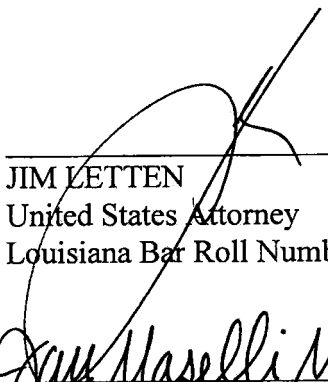
- e. has been commingled with other property which cannot be subdivided without difficulty;


it is the intent of the United States of America to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1).


All in violation of Title 18, United States Code, Section 982.

A TRUE BILL:

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FOREPERSON

  
\_\_\_\_\_  
JIM LETTEN  
United States Attorney  
Louisiana Bar Roll Number 8517

  
\_\_\_\_\_  
JAN MASELLI MANN  
First Assistant U.S. Attorney  
Louisiana Bar Roll Number 9020

  
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ROBERT WEIR  
Special Assistant United States Attorney  
Mississippi Bar Roll Number 101464

New Orleans, Louisiana  
June 15, 2012